

COHEN & GREEN

February 25, 2025

Hon. Philip M. Halpern, U.S.D.J.
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007-1312

By Electronic Filing.

Re: Ordonez-Vargas v. Orange County et al., 25-cv-0064

Dear Judge Halpern:

My firm, with co-counsel, represents Plaintiff in the case above. As the Court asked in ECF No. 6, I write to provide an updated on the status of the stay in *In re: Wellpath Holdings, Inc., et al.*, 24-90533 (Bankr. S.D. Tex.) (“*In re Wellpath*”).

About a week ago, on February 19, Judge Pérez entered a new Order in *In re Wellpath*, addressing the stay and path forward. A copy of that Order is attached to this letter. With possible earlier dissolution, if *In re Wellpath* is dismissed or a Chapter 11 plan becomes effective, the *In re Wellpath* stay is now set to expire on April 30, 2025. Order ¶ 1. Nothing in that order prejudices another motion for an extension, or prohibits creditors from opposing another extension. *Id.*

Given the continuing stay, Plaintiff here believes it is best to continue the matching stay until April 30, 2025, with another status letter due in early May to confirm whether the stay has in fact dissolved. Likewise, Plaintiff would ask that the Court extend the time to serve Defendants until 30 days after the stay expires, so Plaintiff neither violates the stay nor lets the time to serve expire.

As always, I thank the Court for its continued time and attention.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

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cc:

All relevant parties by electronic filing.